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11 UNION PACIFIC RAILROAD COMPANY

12 HUMBOLDT BAYKEEPER, a program of
13 Ecological Rights Foundation, and
14 ECOLOGICAL RIGHTS FOUNDATION, a
15 non-profit corporation,

16 Plaintiffs,

17 v.

18 UNION PACIFIC RAILROAD COMPANY, a
19 Delaware corporation, NORTH COAST
20 RAILROAD AUTHORITY, a state agency, and
21 CUE VI, LLC, an Alaska limited liability
22 company,

23 Defendants.

24 No. 06-02560 JSW

25 **STIPULATION TO EXTEND
26 DEADLINE TO COMPLETE
27 DEPOSITIONS;
28 {PROPOSED} ORDER**

29 Trial Date: August 30, 2010
30 Courtroom 11, 19th Floor
31 Honorable Jeffrey S. White

1 On February 17, 2010, the Court reopened discovery for sixty days to enable Plaintiffs to
2 depose specified witnesses. *See* ECF Dkt. No. 383 at 2. Defendants' counsel is unable to attend
3 the deposition of Caryn Woodhouse scheduled for April 15. However, both the parties and Ms.
4 Woodhouse are available to conduct the deposition on April 22, 2010.

5 IT IS THEREFORE STIPULATED AND AGREED THAT, the sixty-day deadline is
6 extended to allow the deposition of Caryn Woodhouse on April 22, 2010.

7 Dated: March 25, 2010

BRISCOE IVESTER & BAZEL LLP

8 By: 

9 Lawrence S. Bazel
10 Attorneys for Defendants
11 CUE VI, LLC and UNION PACIFIC
12 RAILROAD COMPANY

13 Dated: March 25, 2010

LAWYERS FOR CLEAN WATER, INC.

14

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By:

/s/ _____
16 Layne Friedrich
17 Attorneys for Plaintiffs
18 HUMBOLDT BAYKEEPER and
19 ECOLOGICAL RIGHTS FOUNDATION

20

21 Dated: March 25, 2010

LAW OFFICES OF CHRISTOPHER J. NEARY

22

23

By:

/s/ _____
24 Christopher J. Neary
25 Attorney for Defendant NORTH COAST
26 RAILROAD AUTHORITY

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ATTESTATION

I, Lawrence S. Bazel, am counsel for CUE VI, LLC and Union Pacific Railroad Company and the registered ECF user whose username and password are being used to file this Stipulation To Extend Deadline To Complete Depositions and [Proposed] Order. In compliance with General Order 45 X.B, I hereby attest that the above-identified counsel for Plaintiffs and NCRA concurred in this filing.

Dated: March 25, 2010

Respectfully submitted,

By: /s/ Lawrence S. Bazel.

~~PROPOSED~~ ORDER

After consideration of the Parties' Stipulation to Extend the Time to Complete Depositions, and for good cause appearing:

PURSUANT TO STIPULATION, IT IS SO ORDERED that the Court will allow the deposition of Ms. Caryn Woodhouse be conducted on April 22, 2010

IT IS SO ORDERED.

Dated: March 29, 2010

Jeffrey S. White
JEFFREY S. WHITE
UNITED STATES DISTRICT JUDGE